

# ENERGY STAR® Program Requirements for Roof Products

## **Draft 1 Partner Commitments**

### Commitment

The following are the terms of the ENERGY STAR Partnership Agreement as it pertains to the manufacturing of ENERGY STAR qualified roof products. The ENERGY STAR Partner must adhere to the following program requirements:

**Note:** As with any revisions to an ENERGY STAR specification, once the revision is final, all Partners intending to continue their partnership in ENERGY STAR must submit an updated commitment form under the revised specification.

- comply with current <u>ENERGY STAR Eligibility Criteria</u>, defining the performance criteria that must be
  met for use of the ENERGY STAR certification mark on roof products and specifying the testing
  criteria for roof products. EPA may, at its discretion, conduct tests on products that are referred to as
  ENERGY STAR qualified. These products may be obtained on the open market, or voluntarily
  supplied by Partner at EPA's request;
- comply with current <u>ENERGY STAR Identity Guidelines</u>, describing how the ENERGY STAR marks
  and name may be used. Partner is responsible for adhering to these guidelines and for ensuring that
  its authorized representatives, such as advertising agencies, dealers, and distributors, are also in
  compliance;
- qualify at least one ENERGY STAR roof product within one year of activating the roof products portion of the agreement. When Partner qualifies the product, it must meet the specification (e.g., Tier 1 or 2) in effect at that time;

**Note:** In September, EPA sent letters to those Partners that had not yet submitted qualifying product information even though their partnerships were over a year old. In the letter, EPA requested a response by October 7, 2005. At this time, only two responses have been received. Therefore, EPA has begun taking steps to terminate our partnerships with the remaining companies. EPA will continue to enforce this stipulation of the Partnership Agreement such that only those companies that adhere to all Partner Commitments, including the qualification of at least one product within one year, may continue their ENERGY STAR Partnership.

- provide clear and consistent labeling of ENERGY STAR qualified roof products. The ENERGY STAR
  mark must be clearly displayed in product literature (i.e., user manuals, spec sheets, etc.) and on the
  manufacturer's Internet site where information about ENERGY STAR qualified products is displayed;
- through product literature, provide the following information to end users: 1) a description of the variables that influence the amount of energy savings that can be realized when an ENERGY STAR qualified roof product is installed on a home or building, 2) an acknowledgement that the solar reflectance of any roof products over time may increase or decrease, depending on the product make-up, due to aging and dirt and microbial accumulation, and 3) a description of the proper maintenance procedures required to maximize solar reflectance over the longest period of time possible (e.g., rinsing or power washing each spring or recoating every five years). Partners may continue to use the following statement to meet this requirement: "When installed properly, this product will help reduce energy costs. Actual savings will vary based on geographic location and individual building characteristics. Consult your product manufacturer, roofing contractor, or call 1-888-STAR-YES (1-888-782-7937) for more information." This statement must be placed in close

proximity to the ENERGY STAR mark wherever it is included in product literature and on the manufacturer's Internet site.

 provide to EPA, on an annual basis, an updated list of ENERGY STAR qualifying roof product models. Once the Partner submits its first list of ENERGY STAR qualified roof products, the Partner will be listed as an ENERGY STAR Partner. Partner must provide annual updates in order to remain on the list of participating product manufacturers;

**Note:** In comparing the product lists of ENERGY STAR and other programs (e.g. CRRC), EPA noticed discrepancies in the nomenclature used for brand names and model numbers. It is important for end users to have consistent names and model numbers from which to make purchasing decisions. EPA is conducting a more thorough review of available lists and has begun contacting Partners for which discrepancies are identified. Please be responsive to these requests to ensure the ENERGY STAR list of qualifying roof products is as accurate and user friendly as possible. In addition, if appropriate, EPA may modify the Qualifying Product Information Form (QPI Form) to ask if there are any other trade names for each ENERGY STAR qualified product, and if so, what they are so that they may be listed on the ENERGY STAR Web site.

- for each qualifying roof product, provide to EPA test data to certify that the product has met the
  required performance characteristics. This data may be in the form of a testing report, either from the
  Partner or a third party. EPA will only add models to its product list after reviewing and approving the
  product test results;
- provide to EPA, on an annual basis, unit shipment data or other market indicators to assist in determining the market penetration of ENERGY STAR. Specifically, Partner must submit the total number of ENERGY STAR qualified roof products shipped (in units by model) or an equivalent measurement as agreed to in advance by EPA and Partner. Partner is also encouraged to provide ENERGY STAR qualified unit shipment data segmented by meaningful product characteristics (e.g., capacity, size, speed, or other as relevant), total unit shipments for each model in its product line, and percent of total unit shipments that qualify as ENERGY STAR. The data for each calendar year should be submitted to EPA, preferably in electronic format, no later than the following March and may be provided directly from the Partner or through a third party. The data will be used by EPA only for program evaluation purposes and will be closely controlled. If requested under the Freedom of Information Act (FOIA), EPA will argue that the data is exempt. Any information used will be masked by EPA so as to protect the confidentiality of the Partner;

**Note:** EPA has successfully collected ENERGY STAR qualified unit shipment data from Partners for roof products for the past 3 years. However, each year there are a number of Partners that do not submit this information. This year, EPA has begun taking action against Partners that have not submitted unit shipment data by removing them from our Partner and Qualifying Products list. This action was only taken after several notices to the Partners – the initial contact by e-mail, two follow-up e-mails, and one fax notice. By signing an ENERGY STAR Partnership Agreement, both EPA and the manufacturer are committing to the requirements of ENERGY STAR, including all Partner Commitments. EPA takes these requirements seriously and will continue to take action against those Partners that fail to comply with all of the commitments set forth in this specification.

notify EPA of a change in the designated responsible party or contacts for roof products within 30 days.

### **Performance for Special Distinction**

In order to receive additional recognition and/or support from EPA for its efforts within the Partnership, the ENERGY STAR Partner may consider the following voluntary measures and should keep EPA informed on the progress of these efforts:

- consider energy efficiency improvements in company facilities and pursue the ENERGY STAR mark for buildings;
- purchase ENERGY STAR qualified products. Revise the company purchasing or procurement

specifications to include ENERGY STAR. Provide procurement officials' contact information to EPA for periodic updates and coordination. Circulate general ENERGY STAR qualified product information to employees for use when purchasing products for their homes;

- ensure the power management feature is enabled on all ENERGY STAR qualified monitors in use in company facilities, particularly upon installation and after service is performed;
- provide general information about the ENERGY STAR program to employees whose jobs are relevant to the development, marketing, sales, and service of current ENERGY STAR qualified product models;
- feature the ENERGY STAR mark(s) on Partner Web site and in other promotional materials. If
  information concerning ENERGY STAR is provided on the Partner Web site as specified by the
  ENERGY STAR Web Linking Policy (this document can be found in the Partner Resources section
  on the ENERGY STAR Web site at <a href="www.energystar.gov">www.energystar.gov</a>), EPA may provide links where appropriate
  to the Partner Web site:
- provide a simple plan to EPA outlining specific measures Partner plans to undertake beyond the program requirements listed above. By doing so, EPA may be able to coordinate, communicate, and/or promote Partner's activities, provide an EPA representative, or include news about the event in the ENERGY STAR newsletter, on the ENERGY STAR Web pages, etc. The plan may be as simple as providing a list of planned activities or planned milestones that Partner would like EPA to be aware of. For example, activities may include: (1) increase the availability of ENERGY STAR labeled products by converting the entire product line within two years to meet ENERGY STAR guidelines; (2) demonstrate the economic and environmental benefits of energy efficiency through special in-store displays twice a year; (3) provide information to users (via the Web site and user's manual) about energy-saving features and operating characteristics of ENERGY STAR qualified products, and (4) build awareness of the ENERGY STAR Partnership and brand identity by collaborating with EPA on one print advertorial and one live press event;
- provide quarterly, written updates to EPA as to the efforts undertaken by Partner to increase availability of ENERGY STAR qualified products, and to promote awareness of ENERGY STAR and its message.



# **ENERGY STAR® Program Requirements** for Roof Products

# **Draft 1 Eligibility Criteria**

Below is the Draft 1 product specification (Version 2.0) for ENERGY STAR qualified roof products. A product must meet all of the identified criteria if it is to earn the ENERGY STAR.

- <u>Definitions</u>: Below is a brief description of roof products and other terms as relevant to ENERGY STAR.
  - A. Roof surface: The uppermost part of the roof system that is in direct contact with solar radiation.
  - B. Low-Slope Roofs: Surfaces with a slope of 2:12 inches or less.<sup>1</sup>
  - C. Steep-Slope Roofs: Surfaces with a slope greater than 2:12 inches.
  - D. <u>Low-Slope Roof Products:</u> Products that are typically installed on low-slope surfaces such as single-ply membranes, built-up-roofs (BUR), modified bitumen, spray polyurethane foam, roof coatings, metal panels, and standing-seam profiled metal. Some products that are typically installed on low-slope roofs may also be installed on steep-slope roofs (e.g., single-ply membranes and roof coatings). For the purposes of this specification, the roof product will constitute the uppermost surface of the building structure.
  - E. <u>Steep-Slope Roof Products:</u> Products that are typically installed on steep-slope surfaces such as composite shingles, clay, concrete, or fiber-cement tile, slate, and metal panels. Some products that are typically installed on low-slope roofs may also be installed on steep-slope roofs (e.g., single-ply membranes and roof coatings). For the purposes of this specification, the roof product will constitute the upper most surface of the building structure.

#### **Roof Product Technologies**

- F. <u>Built-Up-Roof (BUR)</u>: Traditional hot asphalt or coal tar built-up roofing membrane assembly consists of alternating layers of felts, fabrics, or mats saturated with bitumen during manufacture, assembled in place, and adhered with applied layers of hot bitumen. Surfacing for the hot BUR can be aggregate embedded in hot asphalt; mineral-surface cap sheets; modified bitumen cap sheets; or smooth-surface applications or coatings.<sup>2</sup>
- G. <u>Asphalt Shingle:</u> Composed of a base material, either organic felt or glass fiber mat; asphalt; and surfacing material, generally in the form of mineral granules.<sup>3</sup>
- H. <u>Metal Roof Component:</u> Metal roof product designed to resemble a traditional steep-slope residential product such as shingle, tile, shake, or slate.
- I. Metal Roof Panel: Metal roofing systems are divided into two categories, architectural and structural. Architectural metal roofs usually require a slope of at least 3:12. Structural metal roofs can be used on roofs with slopes as low as 1/4:12. Steel and aluminum sheets are commonly used to fabricate metal roof panels. Steel requires a corrosion resistant metal coating such as zinc, aluminum, alloys of zinc-aluminum, or tin. Metallic coated steel includes galvanized steel, aluminized steel, zinc-aluminum-coated steel and terne-coated steel. Metallic coated steels are

<sup>&</sup>lt;sup>1</sup> As defined in proposed ASTM Standard E 1918-97.

<sup>&</sup>lt;sup>2</sup> National Roofing Contractors Association <u>Commercial Low-Slope Roofing Materials Guide</u> 1998.

<sup>&</sup>lt;sup>3</sup> Ibid.

also painted to provide additional corrosion protection, as well as color.

- J. Modified Bitumen: Roll roofing products consisting of asphalt, reinforcing layers, and in some cases, surfacing. During manufacture, a polymer (APP, or atactic polypropylene, and SBS, or styrene butadiene styrene, are the most common) is added to the bitumen while heating, which "modifies," or changes, its properties.4
- K. Roof Coating: A material typically applied in the liquid state to the roof surface at the time of construction or at a later time as a retrofit measure. Roof coatings may be bituminous, polymeric, or polymer modified. Bituminous roof coatings are formulated using bitumen. Polymeric roof coatings are formulated using a variety of synthetic resins such as acrylic, neoprene, styrene butadiene, urethane, polyvinyl acetate, and others. Polymer modified roof coatings are manufactured by combining a portion of the polymeric technology with bitumen technology.
- L. Roof Tile: May be composed of clay, concrete, fiber-cement, or synthetic materials. A variety of tile profiles, styles, finishes, and colors are available.
- M. Single-Ply Membrane: A term applied to a sheet membrane which is a membrane fabricated in a controlled factory environment. It is waterproof and weather resistant. It may be a laminate of one or more materials and may or may not contain reinforcing fabrics.5
- N. Spray Polyurethane Foam Roof System: A fully adhered system that consists of a rigid closed-cell sprayed-in-place polyurethane foam insulation and a protective roof coating. Typical coatings include acrylic, silicon, or urethane elastomers.
- O. Variegated Roof Products: A material with a varied surface color, requiring a larger sample measurement of Solar Reflectance.6

#### **Roof Product Performance**

- P. Solar Flux: The direct and diffuse radiation from the sun received at ground level over the solar spectrum expressed in watts per square meter.
- Q. Solar Reflectance: The fraction of solar flux reflected by a surface expressed as a percent or within the range of 0.00 and 1.00.
- R. Solar Spectrum: Radiation originating from the sun, including ultraviolet, visible, and near-infrared radiation. Approximately 99 percent of solar energy lies between wavelengths of 0.3 to 3.5 micrometers (Fm).
- S. Thermal Emittance: The ratio of the radiant heat flux emitted by a sample to that emitted by a blackbody radiator at the same temperature (Total Thermal Emittance).

Note: The Draft 1 ENERGY STAR specification for roof products includes a requirement for thermal emittance; therefore a definition for "Thermal Emittance" has been added to Section 1.

The Draft 1 ENERGY STAR specification for roof products also includes a new test procedure that may be used to measure the solar reflectance of variegated roof products, such as asphalt shingles; therefore a definition for "Variegated Roof Products" has been added to Section 1.

2) Qualifying Products: Any roof product, as defined in Section 1 above, is eligible for ENERGY STAR.

<sup>&</sup>lt;sup>4</sup> National Roofing Contractors Association <u>Commercial Low-Slope Roofing Materials Guide</u> 1998.

<sup>&</sup>lt;sup>5</sup> As found in Single Ply Roofing Industry's Publication, <u>Flexible Membrane Roofing: Professional's Guide to</u> Specifications, 2003.

As defined in Cool Roof Rating Council, Product Rating Program, CRRC-1, October 4, 2005.

<sup>&</sup>lt;sup>7</sup> Ibid.

3) Energy-Efficiency Specifications for Qualifying Products: Only those products listed in Section 2 that meet the criteria below (Tables 1 and 2) may qualify as ENERGY STAR. For roof products that may be applied to either low-slope or steep-slope roofs, such as roof coatings and single-ply membranes, Table 1 contains the applicable ENERGY STAR specifications.

Table 1 – Specifications for Low-Slope Roof Products	
Characteristic	Performance Specification
Energy Efficiency	
Initial Solar Reflectance	Greater than or equal to 0.65
Maintenance of Solar Reflectance	Greater than or equal to 0.50 three years after installation under normal conditions.
Thermal Emittance	Greater than of equal to 0.75
Reliability	
Manufacturer warranty for defects in materials and manufacturing	Each company's warranty for reflective roof products must be equal in all material respects to the product warranty offered by the same company for comparable non-reflective roof products. A company that sells only reflective roof products must offer a warranty that is equal in all material respects to the standard industry warranty for comparable non-reflective roof products.

Table 2 – Specifications for Steep-Slope Roof Products	
Characteristic	Performance Specification
Energy Efficiency	
Initial Solar Reflectance	Greater than or equal to 0.25
Maintenance of Solar Reflectance	Greater than or equal to 0.15 three years after installation under normal conditions.
Thermal Emittance	Greater than or equal to 0.75
Reliability	
Manufacturer warranty for defects in materials and manufacturing	Each company's roof product warranty for reflective roof products must be equal in all material respects to the product warranty offered by the same company for comparable non-reflective roof membrane products. A company that sells only reflective roof products must offer a warranty that is equal in all material respects to the standard industry warranty for comparable non-reflective roof products.

**Note:** A new requirement for thermal emittance of 0.75 is included in this draft. Based on a review of studies linking products of high emittance with energy savings, and in the interest of consistency and relevance as compared with other existing cool roofing programs, EPA has decided to include thermal emittance in the ENERGY STAR specification for roof products.

Because the thermal emittance of a product model, particularly those models with high emittance, does not change much over time, EPA is not including a requirement for maintenance of thermal emittance.

Although not indicated in Table 1, EPA is considering an increase in the initial low slope roof product solar reflectance requirement to 0.70 (but maintain the aged value at 0.50). This will allow ENERGY STAR to maintain relevancy in the market by aligning the program requirements with those of other state and regional initiatives. According to the existing Qualifying Products List, this change would result in roughly 82% of models continuing to qualify with the solar reflectance requirements of ENERGY STAR. EPA is particularly interested in receiving comments on this proposal prior to including it as a requirement.

4) <u>Test Criteria</u>: Manufacturers are required to perform tests and self-certify product models that meet the ENERGY STAR guidelines. Partner agrees to follow the test methods as outlined below. Alternatively,

a Partner already participating in the Cool Roof Rating Council (CRRC) Product Rating Program<sup>8</sup> may submit solar reflectance and thermal emittance product information derived from CRRC certification. Please note, at the time that this document was written, the CRRC Product Rating Program had not yet produced results for maintenance of solar reflectance. Therefore Partners shall either wait until these results are available to submit product information, or use one of the test procedure options listed below to derive values for the maintenance of solar reflectance.

Test results must be reported to EPA using the Roof Products Qualifying Product Information (QPI) Form. Only completed QPI forms will be accepted. QPI forms indicating that data is pending, will not be accepted. In addition, documentation of test results, e.g., test reports, in either hard copy or electronic format, must be submitted to EPA along with the QPI Form for each qualifying product. Note: Supporting documentation must include the test results of all required samples in addition to providing the final average test results for ENERGY STAR qualification.

**Note:** As stated above, EPA will not accept QPI forms that are incomplete. Any forms submitted indicating that data is pending will be sent back to the Partner. This is unlike the CRRC Products Rating Program that will list initial reflectance and emittance data while indicating aged reflectance data as "Pending." In addition, manufacturers are required to provide test results for all data samples, not just the average results, which are used for ENERGY STAR qualification. Additional documentation is being collected to ensure that the appropriate testing was performed within the parameters set forth in the ASTM test procedures and within this specification (e.g. 3 samples).

#### Initial Solar Reflectance

Product shall be tested using ASTM E 903 - Standard Test Method for Solar Absorptance, Reflectance, and Transmission of Materials Using Integrating Spheres. Products need only be tested for solar reflectance (values for solar absorptance and transmission need not be obtained). Manufacturers will submit a 3" X 3" flat sample of each product to a laboratory that has the appropriate equipment. The manufacturer shall request that the test be performed using a black background for the sample. Where appropriate, the sample shall be prepared according to manufacturer recommendation for thickness used in the field.

Product may also be tested using ASTM C 1549 - Standard Test Method for Determination of Solar Reflectance Near Ambient Temperature Using a Portable Solar Reflectometer.

Variegated roof products may also be tested according to the CRRC Test Method #1.9

Particularly with regard to roof coatings, if Partner has changed a fundamental element of product formulation such as the base latex, Partner must retest for the solar reflectance of the product both initially and according to the Maintenance of Solar Reflectance (see next section). In addition, to ensure other product formulation changes will not affect the solar reflectance of the product, Partner shall certify that the product formulation or recipe has not changed since the solar reflectance testing was performed.

#### Maintenance of Solar Reflectance

Partner shall use one of the following methods to test the maintenance of solar reflectance of a roof product. NOTE: The test surface of each sample shall not be washed, cleaned, or wiped in any fashion. Loose dirt, embedded dirt, environmental stains, mold, mildew, and any other material that rests on – or has become incorporated into – the surface of the material shall not be altered.

A) Identify three (3) existing roofs on which the same product was installed a minimum of three years prior. At least one of these existing roofs must be located within a major metropolitan area such as Atlanta, Boston, Chicago, Dallas, Houston, Los Angeles, Miami, Minneapolis, New York, Philadelphia, San Francisco, St. Louis, Washington D.C., etc. The roof product need not have been installed at the same time on the three buildings; however, the roofs must each be at least three years old.

Information on the Cool Roof Rating Council Product Rating Program can be found at www.coolroofs.org

<sup>9</sup> CRRC Test Method #1 may be found at http://www.coolroofs.org/productratingprogram.html

- 1) For low-slope roof products and coatings, use either ASTM E 1918 *Standard Test Method for Measuring Solar Reflectance of Horizontal and Low-Sloped Surfaces in the Field* or ASTM C 1549, to test the solar reflectance of the roof product as installed and weathered for three years. Partner shall divide the roof into at least ten (10) equal sections. Measurements shall be performed in the center of each area. At least three (3) repetitions shall be made of each measurement (the exact same area). Note that is a pond or birdbath occurs in the center of the area to be measured, offset the measurement location so that it is outside of the pond or birdbath. Partner shall take the average of all solar reflectance values obtained from the roof to determine if the solar reflectance of the roof product as installed and weathered for three years is greater than or equal to the threshold value in Table 1. If Partner is employing ASTM E 1918, the test must be performed on a clear day (no clouds) between 10:00 AM and 2:00 PM when the sun is high in the sky and there can be no obstruction in the field of view.
- 2) To measure the solar reflectance of steep-slope roofs as installed and weathered for three years, use ASTM C 1549. Partner shall divide the roof into at least ten (10) equal sections. Measurements shall be performed in the center of each area. At least three repetitions shall be made of each measurement. Partner shall take the average of all solar reflectance values obtained from the roof to determine if the solar reflectance of the roof product as installed and weathered for three years is greater than or equal to the threshold value in Table 2.
- B) Take a minimum of three (3) samples from the each of the existing roofs as identified above. At least three (3) measurements of solar reflectance are to be taken from different areas on each sample using either ASTM E 903 or ASTM C 1549. Partner shall take the average of all solar reflectance values obtained from the panels to determine if the solar reflectance of the weathered roof product is greater than or equal to the threshold values in Tables 1 and 2. Subsequently, the Partner is responsible for ensuring that the roof from which samples were taken is properly repaired so as to resume watertight integrity.
- C) Expose panels outdoors on commercial or private weathering farms that are accredited to ISO/IEC 17025:1999 *General Requirements for the Competence of Testing and Calibration Laboratories*. The panel must be prepared such that the surface to receive solar radiation goes over the intended substrate <sup>10</sup>. At least three (3) panels with the identical formulation as those that were tested for initial solar reflectance must be exposed for three years in accordance with ASTM G 7 *Standard Practice for Atmospheric Environmental Exposure Testing of Nonmetallic Materials*. Each exposure panel must be at least 24 square inches (155 square centimeters) in size, e.g. 4" x 6" or 3" x 8", and must be mounted so that there is no run off from one panel to another. To further avoid runoff onto samples, where possible, the exposure panel should be mounted near the top of the test rack.

At least three (3) measurements of solar reflectance are to be taken from different areas on each weathered panel using either ASTM E 903 or ASTM C 1549. Partner shall take the average of all solar reflectance values obtained from the panels to determine if the solar reflectance of the weathered roof product is greater than or equal to the threshold values in Tables 1 and 2.

- 1) For low-slope roof products and coatings and for product that can be applied to <u>either</u> low-slope or steep-slope roofs, Partner shall use test samples exposed at a slope of 2:12 inches or less (1/4:12 inches is recommended) and facing south.
- 2) For steep-slope roof products and coatings, Partner shall use test samples exposed at a slope between 2:12 inches and 12:12 inches (4:12 inches is recommended) and facing south.

#### Thermal Emittance

Product shall be tested according to ASTM C1371-04a – Standard Test method for Determination of Emittance of Materials Near Room Temperature using Portable Emissometers.

<sup>&</sup>lt;sup>10</sup> For example, if a coating is intended for BUR, the specimen set needs to be prepared using BUR. If the coating is to be used over Modified Bitumen, a specimen set needs to be prepared using Modified Bitumen.

Products may also be tested according to ASTM E408-71(1996)e1 - Standard Test Method for Total Normal Emittance of Surfaces Using Inspection-Meter Techniques.

Note: Once this specification revision is effective, all new data related to maintenance of solar reflectance must be on uncleaned samples in order to be accepted. EPA is eliminating the allowance for cleaning of roof samples or surfaces before solar reflectance test are performed because it does not accurately reflect product performance in the filed, since roofs are rarely cleaned after installation. For products that are being requalified under the revised specification and for which maintenance of solar reflectance testing has already been completed and submitted, EPA will accept data for cleaned samples. All previously submitted Qualifying Product Information (QPI) Forms indicate whether the samples were cleaned prior to testing. Starting on the date when this revised specification becomes effective, EPA will use this information to indicate on our Qualifying Products list which products were cleaned and will describe the difference between values reported for cleaned samples versus those reported for samples that were not cleaned. As of this same effective date, no new data from cleaned samples will be accepted for listing on the Qualifying Product list.

Since the proposed revised specification includes a requirement for thermal emittance, the test procedures for thermal emittance, ASTM C1371 and ASTM E408, have been added to this section.

Variegated roof products, such as asphalt shingles may also be tested according to CRRC Test Method #1. Reference to this test method has been added to this section.

In our previous correspondence EPA requested feedback on the use of accelerated aging techniques to determine the maintenance of solar reflectance. Although not extensive, most responses were not in favor of allowing accelerated aging mostly due to the lack of a test procedure that comes close to reflecting the conditions roofs are subject to in the field. EPA is still open to discussion on this topic and is particularly interested in information about applicable test procedures and resulting data that show a strong correlation between results of solar reflectance test after accelerated aging and those after in-field aging.

5) <u>Effective Date</u>: The date that manufacturers may begin to qualify products as ENERGY STAR will be defined as the *effective date* of the agreement. The ENERGY STAR Roof Products Specification (Version 2.0) shall go into effect on October 31, 2006. Any previously executed agreement on the subject of ENERGY STAR qualified roof products shall be terminated effective October 30, 2006.

**Note:** EPA proposes October 31, 2006 as the effective date for this revised specification taking into consideration how long it will take to finalize the revision and the need to give manufacturers ample time to institute the revision into their company practices. For specification revisions, EPA typically allows a nine-month lead time between when a specification is final and when it becomes effective.

All Partners will be required to submit thermal emittance data for all ENERGY STAR qualified products on a new Version 2.0 QPI Form by the effective date of this specification in order to remain on the qualifying products list. Solar reflectance data need not be resubmitted if nothing has changed. As with solar reflectance, a QPI Form stating results of thermal emittance tests must be accompanied by test data in the form of a testing report either from the Partner or a Third Party.

6) <u>Future Specification Revisions</u>: ENERGY STAR reserves the right to change the specification should technological and/or market changes affect its usefulness to consumers, industry, or the environment. In keeping with current policy, revisions to the specification are arrived at through industry discussions. In the event of a specification revision, please note that the ENERGY STAR qualification is not automatically granted for the life of a product model. To qualify with the energy efficiency criteria of ENERGY STAR, a product model must meet the ENERGY STAR specification in effect on the date of manufacture.

**Note:** As described in the note box above, beginning October 31, 2006, all models for which thermal emittance data is not received will be delisted. Due to the nature of the testing requirements for ENERGY STAR for roof products, EPA will not delist models for which samples were cleaned before performing maintenance of solar reflectance tests. Instead, EPA will indicate with an asterisk or some other marking, which models had cleaned samples and provide an explanation as to why this distinction is important.